

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: LOWER MANHATTAN
DISASTER SITE LITIGATION

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THIS DOCUMENT APPLIES TO ALL
LOWER MANHATTAN DISASTER SITE
LITIGATION

Docket No.: 21 MC 102
21 MC 103 (AKH)

**NOTICE OF JOINT MOTION
TO VOLUNTARILY DISMISS**

PLEASE TAKE NOTICE THAT upon the Declaration of Brian D. Crosby dated March 7, 2011 and the exhibits annexed thereto, the undersigned counsel will move this Court pursuant to Federal Rule of Civil Procedure 41(a)(2), hereby requesting that this Court:

1. grant the proposed Order of Voluntary Dismissal annexed as **Exhibit “1”** in advance of the March 30, 2011 deadline; and award
2. such other and additional relief as this Court deems just and proper.

Dated: New York, New York
 March 7, 2011

Respectfully submitted,

WORBY GRONER EDELMAN &
NAPOLI BERN, LLP
Plaintiffs' Co-Liaison Counsel



Brian D. Crosby (BC-9543)
350 5th Avenue, Suite 7413
New York, New York 10118
(212) 267-3700

To:

All attorneys of record in this matter in the Court's Electronic Case Filing System

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=====JOINT MOTION TO VOLUNTARILY DISMISS=====

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Attorneys for : Plaintiffs
350 5th Avenue, Ste. 7413
New York, New York 10118
(212) 267-3700

The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 that I have read the within papers and that to the best of my knowledge and belief they are factually correct and meritorious.



Attorney name: Brian D. Crosby (BC9543)

Service of a copy of the within
Dated, _____ is hereby admitted.

=====ATTORNEY(S) FOR=====

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the
office of the clerk of the within named court on _____ 200_____.

NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy, will be
presented for settlement to the HON. _____ one of the judges of the
within named Court, at _____ on 200____ at _____ O'clock _____.M.

Dated, _____

Yours, etc.

WORBY GRONER EDELMAN & NAPOLI BERN LLP